Case 2:24-cv-00421-DBB-JCB From: "Ruth Fitzpatrick"

Document 293-2 1 of 33

3-2 Filed 0

PageID.1534

Page

To: "Russell Greer" <russellgreer27@icloud.com>

Date: 4/14/2025 9:35:23 AM

Subject: RE: City Council Agenda Request

Good morning,

Please use the link below to find the City Council agenda inclusion form. If you have any questions, please let me know.

https://cdn.myocv.com/ocvapps/a65789445/files/ RequestForAgendaInclusion%20Revised%20Street%20Closure%20Section.pdf

Ruth Fitzpatrick

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333 Fax: 775-623-6090



----Original Message-----

From: Russell Greer < russellgreer 27@icloud.com >

Sent: Monday, April 14, 2025 5:59 AM

To: Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org > Cc: Waylon Huber <waylon@robinhoodrealtynv.com >

Subject: City Council Agenda Request

Good morning, Ruth.

I was wondering if we could fill out a form to get on the agenda for a city council meeting?

Thanks

https://cdn.myocv.com/ocvapps/a65789445/files/ RequestForAgendaInclusion%20Revised%20Street%20Closure%20Section.pdf

Ruth Fitzpatrick

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 <u>rfitzpatrick@winnemuccacity.org</u> Phone: 775-623-6333 Fax: 775-623-6090

<image001.jpg>

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Sent: Monday, April 14, 2025 5:59 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > Cc: Waylon Huber < waylon@robinhoodrealtynv.com >

Subject: City Council Agenda Request

Good morning, Ruth.

I was wondering if we could fill out a form to get on the agenda for a city council meeting?

Thanks

From: "Russell Greer" < russellgreer27@icloud.com>

To: "Ruth Fitzpatrick" <rfitzpatrick@winnemuccacity.org>

Date: 4/14/2025 11:52:56 PM

Subject: Re: City Council Agenda Request
Attachments: Document (4)_merged_merged.pdf

Hi, Ruth

Please find attached our completed agenda request form.

Thanks.

Russell

Sent from my iPhone

On Apr 14, 2025, at 7:35 AM, Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org> wrote:

\u-257 ?
Good morning,

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https://cdn.myocv.com/ocvapps/a65789445/files/ RequestForAgendaInclusion%20Revised%20Street%20Closure%20Section.pdf

Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rtitzpatrick@winnemuccacity.org
Phone: 775-623-6333
Fax: 775-623-6090

<image001.jpg>

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Sent: Monday, April 14, 2025 5:59 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org >

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Subject: City Council Agenda Request

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Thanks

Document 293-2 Filed 0

Filed 05/16/25 Pa

PageID.1537

Page

RICHARD STONE, Mayor MICHAEL OWENS, Council Seat 1 THERESA L. MAVITY, Council Seat 2 VINCE MENDIOLA, Council Seat 3 ASHLEY MADEN, Council Seat 4 PAM COATS, Council Seat 5



| Alicia E. Heiser, PhD, PE, Manager/Engineer (775) 623-6333 | Ruth Fitzpatrick, Clerk-Treasurer (775) 623-6333 | Mike Rangel, Police Chief (775) 623-6396 | Femando Vega, Public Works Supervisor (775) 623-6381 | Levi Carl, Building Inspector (775) 623-6319 | Fax Number (775) 623-63

CITY OF WINNEMUCCA REQUEST FOR AGENDA INCLUSION

While use of this form is **not** mandatory, such use will help ensure your request to appear before the Winnemucca City Council is not delayed. Please answer each question to the best of your ability:

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			s the latest date by which	n the request will
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Name and	phone number of any Russell Gree st and Last Name: City or County	yone other than the recent Las Vegas	equestor who will address, NV 8	s the Council: 01-895-3501
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100 Years of Community Service, Pride, And Success

IN SUPPORT OF AGENDA REQUEST

This is a serious issue that I would like to present to the City Council for action to be taken:

As we know. Winnemucca only allows a designated four land parcels to house brothels. Since 2019, that area has sat vacant. Per Winnemucca City Code, the current owners are barred from owning a brothel, thus their ownership of the only land to have brothels makes zero sense.

In light of the thousands of miners coming to Winnemucca, this is a matter that needs to be immediately addressed.

WCC 5.12.(E)(5) says that a person can't have a "privilege business license" if they previously had a privilege license

revoked. https://library.municode.com/nv/winnemucca/codes/code of ordinances ?nodeId=TIT5BULIRE CH5.12PRBULI 5.12.030APPRBULIEFCHPO

Lance Gilman and Gilman LLC had a Brothel license revoked ten years ago (the Wild Horse Ranch in Storey County). EXHIBIT A

(https://www.carsonnow.org/11/11/2011/brothel-owners-says-wild-horseranch-brothel-will-be-closed-storey-county).

There are rumors that Lance passed the LLC/property onto his son, Donald, but still, I want to believe the statute applies to the LLC because the LLC had owned the revoked Wild Horse Property when its license was revoked and so anybody connected to that property (Lance or his son) should be barred from owning that land in Winnemucca.

Further, Donald and Lance have let that property sit vacant for 6 years. They clearly don't care about it and have forfeited their right to own it.

ID LLC wants to do business in Winnemucca, as a brothel, in light of the miners coming

We request the city council hold a meeting to make a pre-application determination that the Gilmans are barred from opening a brothel in winnemucca and force a sale through an eminent domain action or a public nuisance action. Under an eminent domain theory, the city takes the land, compensates the Gilmans and then sells to ID LLC. See this article: forcing a sale under eminent domain or a pubic nuisance would not constitute a "taking". https://www.nossaman.com/newsroom-insights-forcedsale-of-public-nuisance-property

Under a public nuisance theory, we would request the City act under WCC 8.00.010(B), which reads:

"Anything which is injurious to health, or indecent and offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property."

By the Gilmans sitting on the land and since they are barred from even operating a brothel, it has created a public nuisance because it has interfered with the ability for tourists and residents to enjoy a brothel in winnemucca. It has injured ID LLC, as we are wanting to open a brothel in winnemucca and cannot because the Gilmans are sitting on it.

In the alternative, we would propose a second zone be approved for a brothel. We have drafted the ordinance for it to be voted on. **EXHIBIT B.**

EXHIBIT A.



NEWS

Brothel owner says Wild Horse Ranch brothel will be closed by Storey County

by **Carson Now Editor** Friday, November 11, 2011 - 5:45pm





Storey County brothel owner Lance
Gilman said Friday that he expects his
Wild Horse Canyon Ranch brothel will
be shuttered Tuesday by county officials
for a violation of county ordinances that
bar silent partners in brothel ownership.

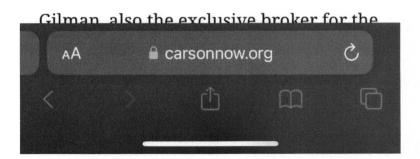


EXHIBIT B

SUMMARY: Adding an additional location to the adult entertainment/brothel zoning district.

The additional location would be subdivided from APN 15-0132-18 and would have an address of 348 West 1st Street.

BILI	L NO.	-2025

ORDINANCE	NUMBER
Oldering	TICHIDLI

AN ORDINANCE AMENDING WINNEMUCCA CITY CODE CHAPTER 17.110.010 (RELATING TO THE ZONING OF ADULT ENTERTAINMENT IN WINNEMUCCA) & WINNEMUCCA CITY CODE 9.12.030(C) (PROSTITUTION AND PANDERING — EXCEPTIONS), COLLECTIVELY HEREIN REFERRED TO AS "WINNEMUCCA'S BROTHEL ZONING ORDINANCES," AND PROVIDING OTHER MATTERS PROPERLY RELATED THERETO.

WHEREAS, the existing adult entertainment/brothel zoned land had its historic structures demolished and its land has sat vacant for 6 years; and

WHEREAS, the existing zoned land is now all owned by one company and said company has a monopoly on the entire City of Winnemucca; and

WHERAS, adding an additional adult entertainment/brothel zone: (i) will be in the public interest, (ii) will not adversely impact the surrounding and adjacent properties, (iii) will be in conformity with the Master Plan for the area, (iv) will not adversely affect the public health, safety and general welfare of the area, (v) will provide an additional area for adult entertainment and brothels to operate at and (vi) will give a competing place for sex workers to work at and patrons to patronize; now, therefore,

THE CITY COUNCIL OF THE CITY OF WINNEMUCCA DO ORDAIN AS FOLLOWS:

WINNEMUCCA CITY CODE CHAPTER 9.12.030 — PROSTITUTION and PANDERING — EXCEPTIONS

- **A.** Except as provided in subsection C of this section, it is unlawful for any person:
- 1. To aid, offer or agree to commit any lewd or indecent act or any act of prostitution;
- 2. To offer to secure or secure another for the purpose of committing any act of prostitution, fornication, assignation or any other lewd or indecent act with any other
- 3. To be in or near any thoroughfare or public place for the purpose of inducing, enticing or procuring another to commit an act of lewdness, fornication or unlawful sexual intercourse;
- 4. Knowingly to receive, offer or agree to receive any person into any place or building for the purpose of assignation or of performing any act of lewdness or fornication or knowingly to permit any person to remain there for any such purposes;

- 5. In any way to aid, abet or participate in the doing of any of the acts prohibited by this subsection.
- **B.** Any person who violates any of the provisions of subsection A of this section is guilty of a misdemeanor.
- C. Notwithstanding the provisions of subsections A and B of this section, prostitution may be engaged in within any structure or building which is situate situated in Block 40 or Block 41 of the Riverside Addition to the city. Additionally, prostitution may be engaged at 348 W 1st Street, which shall be subdivided into its own parcel from APN 15-0132-18, after approval of this ordinance. Any premises operating in the locations listed herein must be issued a valid city brothel business license and each employee or independent contractor therein holds must hold a valid city brothel work and valid health card, if applicable.

WINNEMUCCA CITY CODE CHAPTER 17.110 — AE ADULT ENTERTAINMENT DISTRICT

17.110.010 — Purpose

The AE adult entertainment district is intended to provide an area for adult-oriented entertainment and activities on a commercial level. This is the only zone within the city to permit such allowed uses. This district shall be restricted to Block 40 and Block 41 of the Riverside Addition of the city. shall be restricted to the following areas:

A. Block 40 and Block 41 of the Riverside Addition of the city, and B. 348 W 1st Street of the city, which shall be subdivided into its own parcel from APN 15-0132-18, after approval of this ordinance.

PROPOSED:		
ADOPTED:		
VOTE OF CI	TY COUNCIL:	
Ayes:	Councilmen/women:	
Nays:	Councilmen/women:	
Absent:	Councilmen/women:	
Not Voting:	Councilmen/women:	

AP	PR	OV	ED:
	1 1/	\mathbf{v}	LUD.

ATTEST:

Richard Stone

Ruth Fitzpatrick

Mayor

City Clerk

From: "Russell Greer" < russell greer 27@icloud.com>

To: "Ruth Fitzpatrick" <rfitzpatrick@winnemuccacity.org>

Date: 4/24/2025 1:51:59 PM

Subject: Re: City Council Agenda Request

Attachments: Final request draft .pdf

Sorry, I sent the wrong file. Here you go.

Thanks.

Sent from my iPhone

On Apr 24, 2025, at 11:47 AM, Russell Greer <russellgreer27@icloud.com> wrote:

\u-257 ?Hi, Ruth

After doing more research, I had to update the agenda request. Please find it attached. As stated on the sheet, May 20th would work better for me.

<Merged.pdf>

On Apr 14, 2025, at 9:52 PM, Russell Greer <russellgreer27@icloud.com> wrote:

\u-257 ?Hi, Ruth

Please find attached our completed agenda request form.

Thanks.

Russell

<Document (4)_merged_merged.pdf>

Sent from my iPhone

On Apr 14, 2025, at 7:35 AM, Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org> wrote:

\u-257 ?
Good morning,

Please use the link below to find the City Council agenda inclusion form. If you have any questions, please let me know.

Document 293-2 Filed 05/16/25

PageID.1547

Page

RICHARD STONE, Mayor MICHAEL OWENS, Council Seat 1 THERESA L. MAVITY, Council Seat 2 VINCE MENDIOLA, Council Seat 3 ASHLEY MADEN, Council Seat 4 PAM COATS, Council Seat 5



 Alicia E. Heiser, PhD, PE, Manager/Engineer
 (775) 623-6333

 Ruth Fitzpatrick, Clerk-Treasurer
 (775) 623-6333

 Mike Rangel, Pollice Chief
 (775) 623-6396

 Fernando Vega, Public Works Supervisor
 (775) 623-6319

 Levi Carl, Building Inspector
 (775) 623-6319

 Fax Number
 (775) 623-6090

 E-Mail
 winnemucca@winnemuccacity.org

CITY OF WINNEMUCCA REQUEST FOR AGENDA INCLUSION

While use of this form is **not** mandatory, such use will help ensure your request to appear before the Winnemucca City Council is not delayed. Please answer each question to the best of your ability:

1.	Name o	of person or Organiza	ation making th			
2.	Reside	nce of person making	g the request:	Clark Co	ounty/Winne	
 3. 4. 	Name a	and phone number of	f anyone other reer; Las	Vegas, N' iding the city	V 8 √ code to all®	
5.	-	et Closure: Requested Street(s	curre	nt land own	ers to sell.	
	b.	Date(s) of Closure:				
	C.	Time(s) for Closure: (Please include any time	you may need fo	r set up and/or tear o	lown in the requested	time above)
	d.					end times of the parade.
6.	Reques	st is for something otlease see the attac	her than Stree hed page.	t Closure:		
7.	Reques	st is for: XAction	Inforn May 6th, 202	nation 5		
8.	Reques	sted Meeting Date: _				
9.	If reque	ested meeting date is	not available,	will a delay have	e an adverse effec	t on this request:
		Yes		110	No	
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the r	equest is m	form, you certify under penalty nade voluntarily, with no purpo not deceptive (that is, the info	se of evasion or inte	nt to deceive, is not unfa	air (that is, it is not likely to	n underlying the request and that o cause substantial injury to
All re		administratively reviewed price	or to placement on ar	n agenda. Submission o	f this request form does r	not guarantee inclusion on any
agoi		ssell Greer				2
	ted name o	of Requestor)	801-895-3	 501	(Signature of Requesto info@intim	atedealings.com
(Dat	e Signed)		(phone)		(email)	

UPDATED IN SUPPORT OF AGENDA REQUEST

This is a serious issue that I would like to present to the City Council for action to be taken:

As we know, Winnemucca only allows a designated four land parcels to house brothels. Since 2019, that area has sat vacant. Per Winnemucca City Code, the current owners are barred from owning a brothel, thus their ownership of the only land to have brothels makes zero sense.

In light of the thousands of miners coming to Winnemucca, this is a matter that needs to be immediately addressed.

WCC 5.12.010(E)(5) says that a person can't have a "privilege business license" if they previously had a privilege license

revoked. (https://library.municode.com/nv/winnemucca/codes/code_of_ordinances ?nodeId=TIT5BULIRE_CH5.12PRBULI_5.12.030APPRBULIEFCHPO)

Lance Gilman and Gilman Development LLC had a Brothel license revoked ten years ago (the Wild Horse Ranch in Storey County). **EXHIBIT A** (https://www.carsonnow.org/11/11/2011/brothel-owners-says-wild-horse-ranch-brothel-will-be-closed-storey-county). The LLC that held that brothel license was also owners by Lance and it was Wildhorse Saloon LLC. **EXHIBIT B.**

Lance passed all of his LLCs/properties onto his son, Donald. I believe Donald is also precluded from operating a brothel in Winnemucca too because he owns the LLC that had its brothel license revoked and so Donald is attached to an entity that lost a privilege license, thereby making him disqualified under city ordinance. **EXHIBIT C.** (https://esos.nv.gov/EntitySearch/BusinessInformation).

Further, Donald and Lance have let that property sit vacant for 6 years. They clearly don't care about it and have forfeited their right to own it.

ID LLC wants to do business in Winnemucca, as a brothel, in light of the miners coming.

We request the city council hold a meeting to make a pre-application determination that the Gilmans are barred from opening a brothel in winnemucca.

We had originally proposed an eminent domain sale, but in light of discovering Section 22 of the Nevada Constitution, eminent domain sales can't be used for private development.

We therefore would hope that seeing that he can't run a brothel In Winnemucca, that Donald will make the mature decision to sell his land to us.

In the alternative, we would propose a second zone be approved for a brothel. We have drafted the ordinance for it to be voted on. **EXHIBIT D.**

Case 2:24-cv-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1549 Page 16 of 33

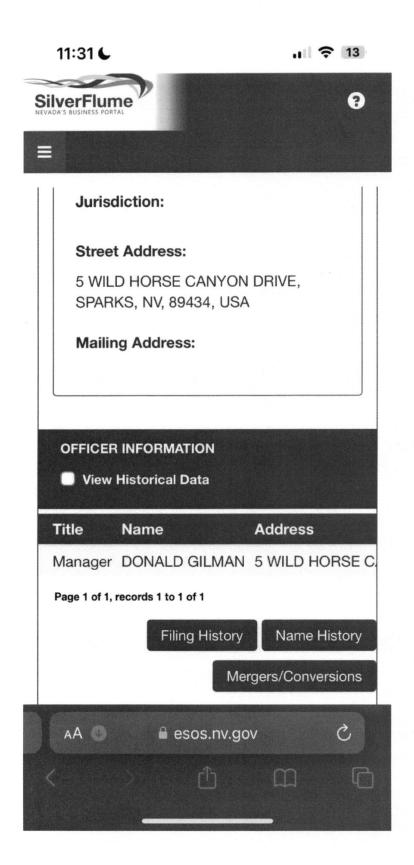
EXHIBIT A

Case 2:24-cv-00421-DBB-JCB



18 of 33





SUMMARY: Adding an additional location to the adult entertainment/brothel zoning district.

The additional location would be subdivided from APN 15-0132-18 and would have an address of 348 West 1st Street.

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UNDINANCE NUMBER	ORDINANCE	NUMBER
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- 3. To be in or near any thoroughfare or public place for the purpose of inducing, enticing or procuring another to commit an act of lewdness, fornication or unlawful sexual intercourse;
- 4. Knowingly to receive, offer or agree to receive any person into any place or building for the purpose of assignation or of performing any act of lewdness or fornication or knowingly to permit any person to remain there for any such purposes;

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17.110.010 — Purpose

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I KOI OSED.			
ADOPTED:			
VOTE OF CI	TY COUNCIL:		
Ayes:	Councilmen/women:_		
Nays:	Councilmen/women:		
Absent:	Councilmen/women:		
Not Voting:	Councilmen/women:		

City Clerk

APPROVED:

ATTEST:

Richard Stone

Ruth Fitzpatrick

Mayor

Case 2:24-gy-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1555 Page

To: "Russell Greer" <russellgreer27@icloud.com>

Date: 5/2/2025 12:26:06 PM

Subject: RE: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Mr. Greer,

If you would like the power point included in the packet that will be distributed to the council today, it would need to be received shortly. If you miss that deadline, the council members would still be able to see the presentation during the council meeting.

Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org
Phone: 775-623-6333
Fax: 775-623-6090



From: Russell Greer < russellgreer 27@icloud.com>

Sent: Friday, May 2, 2025 10:02 AM

To: Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org>
Cc: Waylon Huber <waylon@robinhoodrealtynv.com>

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Hi. Can I submit by 5 pm today.

Russell Greer

CEO of ID LLC/Paralyzed Face Productions/CART U

NV Bus. License #NV20222557279

www.russellgreer.com

Sent from my iPhone

On May 2, 2025, at 8:16 AM, Ruth Fitzpatrick rfitzpatrick@winnemuccacity.org > wrote:

\u-257 ? Mr. Greer,

If you have a PowerPoint that you would like to share, please email it to me as soon as possible.

Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org
Phone: 775-623-6333

Fax: 775-623-6090



From: Russell Greer < russellgreer 27@icloud.com

Sent: Friday, May 2, 2025 3:45 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > Cc: Waylon Huber < waylon@robinhoodrealtynv.com >

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Ruth,

Would the city allow a power point presentation?

Sent from my iPhone

On May 1, 2025, at 8:39 AM, Russell Greer < russellgreer 27@icloud.com > wrote:

\u-257 ?Ruth,

Thanks for the reply. could we actually be put on the May 20th agenda?

Sent from my iPhone

On May 1, 2025, at 8:27 AM, Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > wrote:

\u-257 ? Good morning,

Attached please find the Agenda for this coming Tuesday's regular meeting of the Winnemucca City Council.

Thank you.

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333

Fax: 775-623-6090

<image001.jpg>

Case 2:24-cv-00421-DBB-JCB

Document 293-2 24 of 33 Filed 05/16/25 PageID.1557 Page

Case 2:24-cv-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1558 Page From: "Ruth Fitzpatrick" 25 of 33

To: "Russell Greer" <russellgreer27@icloud.com>

Date: 5/1/2025 10:41:27 AM

Subject: RE: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Mr. Greer,

May 6, 2025 is the date that best works for the City of Winnemucca.

Ruth Fitzpatrick

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333 Fax: 775-623-6090



From: Russell Greer < russellgreer 27@icloud.com>

Sent: Thursday, May 1, 2025 8:39 AM

To: Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org>
Cc: Waylon Huber <waylon@robinhoodrealtynv.com>

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Ruth,

Thanks for the reply. could we actually be put on the May 20th agenda?

Sent from my iPhone

On May 1, 2025, at 8:27 AM, Ruth Fitzpatrick <r dispatrick@winnemuccacity.org > wrote:

\u-257 ? Good morning,

Attached please find the Agenda for this coming Tuesday's regular meeting of the Winnemucca City Council.

Thank you.

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333 Fax: 775-623-6090

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Case 2:24-cv-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1560 Page

To: "Ruth Fitzpatrick" <rfitzpatrick@winnemuccacity.org>

Date: 5/6/2025 2:23:17 PM

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Can you push it to the end of the meeting? I'm on a business call. I will be there

Sent from my iPhone

On May 6, 2025, at 12:18 PM, Russell Greer <russellgreer27@icloud.com> wrote:

\u-257 ?Ok, I will be there

Sent from my iPhone

On May 6, 2025, at 12:07 PM, Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org> wrote:

\u-257 ?

Mr. Greer:

Although you will not be available for today's City Council meeting, the Council will still consider the request to possibly expand the AE District. If the Council is open to the idea, then a future request for a specific property may be warranted. The Council may decide that they have no interest in expanding the AE District regardless of location. If that is the case, then no future request, from you or another other person, will be considered. Staff is seeking guidance on how to handle this type of request in the future, so the agenda item still holds merit.

Thank you, Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org
Phone: 775-623-6333

Fax: 775-623-6090

<image001.jpg>

From: Russell Greer < russell greer 27@icloud.com>

Sent: Tuesday, May 6, 2025 4:29 AM

To: Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org> **Cc:** Waylon Huber <waylon@robinhoodrealtynv.com>

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Ruth,

Sorry for the last minute note, but Can you please remove us from the agenda today? We had some nuts and bolts come loose. We will possibly re-file another agenda request in a few months.

Thanks

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On May 2, 2025, at 3:38 PM, Russell Green russellgreer27@icloud.com > wrote:

\u-257 ?Ruth,

Not sure if my email sent, but please find attached the PowerPoint.

<New AE Zone power point .pptx>

On May 2, 2025, at 10:26 AM, Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > wrote:

\u-257 ? Mr. Greer,

If you would like the power point included in the packet that will be distributed to the council today, it would need to be received shortly. If you miss that deadline, the council members would still be able to see the presentation during the council meeting.

Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org
Phone: 775-623-6333
Fax: 775-623-6090

<image001.jpg>

From: Russell Greer < russellgreer 27@icloud.com

Sent: Friday, May 2, 2025 10:02 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > Cc: Waylon Huber < waylon@robinhoodrealtynv.com >

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Hi. Can I submit by 5 pm today.

Russell Greer

CEO of ID LLC/Paralyzed Face Productions/CART U

NV Bus. License #NV20222557279

www.russellgreer.com

Sent from my iPhone

On May 2, 2025, at 8:16 AM, Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > wrote:

\u-257 ? Mr. Greer,

If you have a PowerPoint that you would like to share, please email it to me as soon as possible.

Ruth Fitzpatrick

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org
Phone: 775-623-6333

Fax: 775-623-6090

x: 775-623-6090

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Page

From: Russell Greer < russell greer 27@icloud.com >

Sent: Friday, May 2, 2025 3:45 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org > Cc: Waylon Huber < waylon@robinhoodrealtynv.com >

Subject: Re: May 6th, 2025, Regular Meeting of the Winnemucca City Council

Ruth,

<image001.jpg>

Would the city allow a power point presentation?

Sent from my iPhone

On May 1, 2025, at 8:39 AM, Russell Greer < russellgreer 27@icloud.com > wrote:

\u-257 ?Ruth,

Thanks for the reply. could we actually be put on the May 20th agenda?

Sent from my iPhone

On May 1, 2025, at 8:27 AM, Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org > wrote:

\u-257? Good morning,

Attached please find the Agenda for this coming Tuesday's regular meeting of the Winnemucca City Council.

Thank you.

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333

Fax: 775-623-6090

<image001.jpg>

<A050625 regular.pdf>

Case 2:24-cv-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1563 Page From: "Ruth Fitzpatrick" 30 of 33

From: "Ruth Fitzpatrick" 30 of 33

To: "Russell Greer" < russell Greer 27@icloud.com >

Date: 5/16/2025 9:30:13 AM Subject: RE: Special elections

Mr. Greer,

The City of Winnemucca ("City") received an email from you on May 12, 2025, with the following inquiry: "What are Winnemucca's special election rules? I want to get this adult entertainment zoning issue on the ballot as soon as possible for a special election."

Your question appears to be a question seeking legal advice. This office does not give legal advice.

The City by law responds to requests for public records, but there is no similar law requirement requiring responses to requests for information; however, if the City is aware of where or how information may be accessed, the City may share that knowledge with a member of the public. Your inquiry did not specify a record you are requesting. To the extent that your inquiry could be construed as a request for a public record, you are advised that the laws of the state of Nevada and the city of Winnemucca are available to the public for inspection at no charge from many sources, including public libraries, the Nevada State Library, the Internet and the state of Nevada website.

Ruth Fitzpatrick
City Clerk Treasurer

Ruth Fitzpatrick
City Clerk Treasurer
90 W Fourth St
Winnemucca, NV 89445
rfitzpatrick@winnemuccacity.org

Phone: 775-623-6333 Fax: 775-623-6090

----Original Message-----

From: Russell Greer <russellgreer27@icloud.com>

Sent: Saturday, May 10, 2025 8:11 PM

To: Ruth Fitzpatrick <rfitzpatrick@winnemuccacity.org>Co: Waylon Huber <waylon@robinhoodrealtynv.com>

Subject: Special elections

Hi Ruth

What are Winnemucca's special election rules? I want to get this adult entertainment zoning issue on the ballot as soon as possible for a special election.

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To: "Ruth Fitzpatrick" <rfitzpatrick@winnemuccacity.org>

Date: 5/14/2025 5:56:29 AM

Subject: Do not consent to emails being released

Hello, Ruth

There is a man named Matthew Hardin, who is asking around Humboldt County staff for communication regarding me.

He is an attorney, but a very unethical one at that. He is representing a stalking site in a copyright case that I had filed against his client three years ago. I actually won an appeal at the tenth circuit court of appeals in 2023.

He is trying to gather every conversation about me to establish a case because I had tried postponing a zoom conference last Tuesday because it was going to conflict with the city council meeting I was given short term notice of that you wouldn't postpone.

The emails I've had with the city are completely irrelevant and he is abusing his position as an attorney the conversations onto the stalking site.

I do not consent to the release of ANY OF MY CONVERSATIONS. If he wants them, please request that he get a court order.

Thank you!

Case 2:24-cv-00421-DBB-JCB Document 293-2 Filed 05/16/25 PageID.1565 Page

From: "Ruth Fitzpatrick" 32 of 33

To: "Russell Greer" < russell greer 27@icloud.com>

Date: 5/14/2025 6:23:31 PM

Subject: RE: Do not consent to emails being released

Mr. Greer:

A transmittal sent earlier today from you to my city email address indicated that inquiries were being made to local governments regarding communications "regarding" you or "conversations" about you, and that "...emails [you] had with the city are completely irrelevant." You concluded the email with the comment that: "I do not consent to the release of ANY OF MY CONVERSATIONS."

Email communications to and from the city email addresses are public records per the Nevada Public Records Act (NPRA). Generally, public records must be disclosed for inspection and copying, unless the record is declared confidential by law. If a governmental entity must deny a person's request to inspect or copy the public record because it is confidential the governmental entity is required to provide the requester with notice in writing that the record is confidential, and the entity must cite to a specific statute or other legal authority that makes the record confidential. Under the NPRA, open records are the rule, and any non-disclosure of records is the exception. The burden of proving that a record should not be disclosed is on the governmental entity, and that proof usually involves either a citation to a legal authority of a declaration of confidentiality or a showing that the entity's interest in non-disclosure clearly outweighs the public's interest in access. There is no legal authority which declares that email communications you had or may have with the city regarding you or conversations about you are confidential. Likewise, there is no apparent reason the city would have to not disclose such communications. Accordingly, if a public records request is made for email communications you have had with the city (including your earlier email referenced above), or that the city has had with you (including this email), the records will be provided unless it can be shown there is legal authority declaring such communications confidential, or that the public's interest in access is outweighed by some interest the city has in non-disclosure. The consent, or lack of consent, of a person who is the author, or the subject of the records is not relevant to the determination of whether or not such public records are released.

Ruth Fitzpatrick City Clerk

Ruth Fitzpatrick City Clerk Treasurer 90 W Fourth St Winnemucca, NV 89445 rfitzpatrick@winnemuccacity.org Phone: 775-623-6333 Fax: 775-623-6090



----Original Message-----

From: Russell Greer < russellgreer 27@icloud.com >

Sent: Wednesday, May 14, 2025 3:56 AM

To: Ruth Fitzpatrick < rfitzpatrick@winnemuccacity.org >

Subject: Do not consent to emails being released

Hello, Ruth

There is a man named Matthew Hardin, who is asking around Humboldt County staff for communication regarding me.

He is an attorney, but a very unethical one at that. He is representing a stalking site in a copyright case that I had filed against his client three years ago. I actually won an appeal at the tenth circuit court of appeals in 2023.

He is trying to gather every conversation about me to establish a case because I had tried postponing a zoom conference last Tuesday because it was going to conflict with the city council meeting I was given short term notice of that you wouldn't postpone.

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I do not consent to the release of ANY OF MY CONVERSATIONS. If he wants them, please request that he get a court order.

Thank you!